

LAURA CURRAN
County Executive



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COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY
July 12, 2018

Hon. A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Chmil v. County of Nassau, at al.
17-CV-5459 (JS)(AKT)

Dear Judge Tomlinson:

Further to Your Honor's Individual Rules and Scheduling Order of February 27, 2018, counsels submit this correspondence as and for the parties' Joint Discovery Status Report. We are pleased to report that discovery is progressing, and counsels are working together to keep the present case on track.

Requests for Production of Documents
& Requests for Interrogatories

The parties have respectively served and responded to interrogatories and requests for documents.

Confidentiality Agreement

A Stipulation and Order of Confidentiality was entered into by the parties on April 13, 2018. DE20. Further to this Court's directive on July 13, 2018 the parties re-submitted the Stipulation and Order of Confidentiality with the appropriate acknowledgment. DE23.

Party Depositions

Presently undersigned counsels are working on scheduling party depositions as well as non-party depositions. We anticipate commencing depositions during the second and/or third week of August in part due to summer vacation scheduling issues with defendants.

Open Items

At present, there are no open discovery issues.

Thanking the Court for its time and consideration, I remain

Respectfully,

/s/ Alexander R. Klein

Alexander R. Klein

Attorney for the Plaintiffs

/s/ Pablo A. Fernandez

Pablo A. Fernandez

Deputy County Attorney

Attorney for County Defendants